

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Case No. 1:18-cr-00681

v.

NOTICE OF MOTION

MANUEL CHANG,

Defendant.
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Adam Ford with its accompanying exhibits, Defendant Manuel Chang, through his undersigned counsel, hereby moves this Court before the Honorable Nicholas G. Garaufis at the United States District Courthouse, 225 Cadman Plaza East Brooklyn, New York 11201, to dismiss the indictment, and for such other and further relief as the Court may deem just and proper.

Dated: February 21, 2024

New York, New York

FORD O'BRIEN LANDY LLP

s/ Adam Ford

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